



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

JUL 20 2000

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

4WD-RPB

Mr. Don Williams  
Plant Environmental Coordinator  
Grenada Manufacturing, LLC  
635 Highway 332  
Grenada, Mississippi 38901

Subject: Review Interim Measures Workplan  
Randall Textron Facility,  
Grenada, Mississippi  
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

The Environmental Protection Agency (EPA) has reviewed your Interim Measures Work Plan (IMWP) submitted June 14, 2000. EPA requested that the IMWP address SWMUs 13, 14 and 15; AOCs A and B; and Site-wide Groundwater Corrective Action. Thank you for your timely submittal of this document. While the IMWP contained several excellent proposals for longer term corrective measures, it fell somewhat short in the area of Interim Measures that could be implemented in the near term to obtain immediate environmental protection.

The IMWP pointed out that in the past, the facility has undertaken practical measures to contain and confine the plumes of TCE and toluene including source removal where necessary, and closure of the former Equalization Lagoon. The effectiveness of this source removal of TCE and toluene has tapered off in recent years. Rather than put forth another proposal for TCE and toluene interim measures, the facility has tentatively proposed a technical remedy composed of a downgradient, zero valence metal barrier; coupled with a source or upgradient synergistic reduction technology. EPA agrees that the placement of these technology controls requires additional sampling to determine optimum placement and composition of controls. EPA has already approved a fourteen week extension of the due date for the facility's final RFI Report where information from the facility's expanded monitoring network will be summarized.

EPA asked the facility to develop a schedule for closure of the Chromium Destruct Pit, (SWMU 14) testing of soil around the unit for possible removal, and a plan for removal of contaminated materials. EPA recommended including the Chromium Acid Baths from the production line in this process of testing, decontamination and/or removal because a release from the production area is suspected and EPA can call these units Areas of Concern and compel testing and cleanup.

In the IMWP, the facility proposed an indefinite schedule for closure of the Chromium Destruct Pit, including finding a suitable vendor, replacement of Chromium Plating Operations with another vendor within 90 days of finding a vendor, and closure of the Chromium Destruct pit within 60 days of cessation of plating operations. EPA cannot accept such an open ended proposal for finding a suitable vendor, as an interim measure. EPA will allow 90 days from receipt of this letter for Grenada Mfg. to find a suitable chromium plating vendor. The Interim Measures Schedule will then proceed as specified on page 2-4 of the IMWP, the second item 2. Because the Chromium Destruct Pit continues to act as a source of groundwater Chromium contamination as long as it is in existence, EPA will require removal of the contents of the Chromium Destruct Pit as a source control measure when 180 days have passed from the receipt of this letter, whether a suitable vendor has been found and approved or not. As per the schedule on page 2-4 EPA will require a Closure Plan for the Destruct Pit within 60 days of cessation of its use. The facility may wish to consider alternatives to the use of the Destruct Pit, such as an above ground tank, if the facility wishes to continue chromium operations once the interim source removal has gone into effect.

This IMWP is hereby approved, with the exception noted above, regarding Interim Measures at the Chromium Destruct Pit. The facility will be required to update its Quality Assurance Project Plan (QAPP) before proceeding with further sampling and monitoring at the site. The facility is cautioned regarding confusion of the Corrective Measures Process with the Interim Measures imposed. Interim Measures are imposed as shorter term measures to reduce or eliminate a threat to the environment. Corrective Measures include Interim Measures, but the Corrective Measures Study in the HSWA process involves selection of the final remedy for the threat to the environment and is a longer term solution than an Interim Measure. There is no accommodation in the Interim Measures process for an 'Interim Measures Study'. The author of the IMWP appears to have confused this term with a 'Corrective Measures Study' which is a study of longer term corrective measures alternatives.

If you have any questions or concerns regarding this letter, please contact Mr. Don Webster, your EPA Project Manager, at (404) 562-8469 or Ms. Lael Butler, Corrective Action Specialist, at (404) 562-8453.

Sincerely,



Narindar M. Kumar,  
Chief, RCRA Programs Branch  
Waste Management Division

Enclosures

cc: Louis Crawford, MDEQ  
John Devic, Textron Automotive  
John Bozick, Meritor Automotive

JUL 20 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

4WD-RPB

Mr. Don Williams  
Plant Environmental Coordinator  
Grenada Manufacturing, LLC  
635 Highway 332  
Grenada, Mississippi 38901

Subject: Review Interim Measures Workplan  
Randall Textron Facility,  
Grenada, Mississippi  
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

The Environmental Protection Agency (EPA) has reviewed your Interim Measures Work Plan (IMWP) submitted June 14, 2000. EPA requested that the IMWP address SWMUs 13, 14 and 15; AOCs A and B; and Site-wide Groundwater Corrective Action. Thank you for your timely submittal of this document. While the IMWP contained several excellent proposals for longer term corrective measures, it fell somewhat short in the area of Interim Measures that could be implemented in the near term to obtain immediate environmental protection.

The IMWP pointed out that in the past, the facility has undertaken practical measures to contain and confine the plumes of TCE and toluene including source removal where necessary, and closure of the former Equalization Lagoon. The effectiveness of this source removal of TCE and toluene has tapered off in recent years. Rather than put forth another proposal for TCE and toluene interim measures, the facility has tentatively proposed a technical remedy composed of a downgradient, zero valence metal barrier; coupled with a source or upgradient synergistic reduction technology. EPA agrees that the placement of these technology controls requires additional sampling to determine optimum placement and composition of controls. EPA has already approved a fourteen week extension of the due date for the facility's final RFI Report where information from the facility's expanded monitoring network will be summarized.

EPA asked the facility to develop a schedule for closure of the Chromium Destruct Pit, (SWMU 14) testing of soil around the unit for possible removal, and a plan for removal of contaminated materials. EPA recommended including the Chromium Acid Baths from the production line in this process of testing, decontamination and/or removal because a release from the production area is suspected and EPA can call these units Areas of Concern and compel testing and cleanup.

In the IMWP, the facility proposed an indefinite schedule for closure of the Chromium Destruct Pit, including finding a suitable vendor, replacement of Chromium Plating Operations with another vendor within 90 days of finding a vendor, and closure of the Chromium Destruct pit within 60 days of cessation of plating operations. EPA cannot accept such an open ended proposal for finding a suitable vendor, as an interim measure. EPA will allow 90 days from receipt of this letter for Grenada Mfg. to find a suitable chromium plating vendor. The Interim Measures Schedule will then proceed as specified on page 2-4 of the IMWP, the second item 2. Because the Chromium Destruct Pit continues to act as a source of groundwater Chromium contamination as long as it is in existence, EPA will require removal of the contents of the Chromium Destruct Pit as a source control measure when 180 days have passed from the receipt of this letter, whether a suitable vendor has been found and approved or not. As per the schedule on page 2-4 EPA will require a Closure Plan for the Destruct Pit within 60 days of cessation of its use. The facility may wish to consider alternatives to the use of the Destruct Pit, such as an above ground tank, if the facility wishes to continue chromium operations once the interim source removal has gone into effect.

This IMWP is hereby approved, with the exception noted above, regarding Interim Measures at the Chromium Destruct Pit. The facility will be required to update its Quality Assurance Project Plan (QAPP) before proceeding with further sampling and monitoring at the site. The facility is cautioned regarding confusion of the Corrective Measures Process with the Interim Measures imposed. Interim Measures are imposed as shorter term measures to reduce or eliminate a threat to the environment. Corrective Measures include Interim Measures, but the Corrective Measures Study in the HSWA process involves selection of the final remedy for the threat to the environment and is a longer term solution than an Interim Measure. There is no accommodation in the Interim Measures process for an 'Interim Measures Study'. The author of the IMWP appears to have confused this term with a 'Corrective Measures Study' which is a study of longer term corrective measures alternatives.

If you have any questions or concerns regarding this letter, please contact Mr. Don Webster, your EPA Project Manager, at (404) 562-8469 or Ms. Lael Butler, Corrective Action Specialist, at (404) 562-8453.

Sincerely,



Narindar M. Kumar,  
Chief, RCRA Programs Branch  
Waste Management Division

Webster



Butler



McCurry



Kumar

7 150 286

US  
Re  
No In.  
Do not  
Sent to

7-20-00

PS Form 3800, April 1995

635 HIGHWAY 332  
GRENADA MS 38901

DON WILLIAMS PLANT ENVIRONMENTAL COOR  
GRENADA MANUFACTURING LLC

ied Mail  
ided.  
ail (See reverse)

Street & Nu  
Post Office, Si  
Postage  
Certified Fee  
Special Delivery Fee  
Restricted Delivery Fee  
Return Receipt Showing to Whom & Date Delivered  
Return Receipt Showing to Whom, Date, & Addressee's Address  
TOTAL Postage & Fees \$  
Postmark or Date

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

DON WILLIAMS PLANT ENVIRONMENTAL COOR  
GRENADA MANUFACTURING LLC  
635 HIGHWAY 332  
GRENADA MS 38901

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

Altan Baker 7-22-00

C. Signature

X Altan Baker ☐ Agent ☒ Addressee

D. Is delivery address different from item 1? ☐ Yes ☒ No

- ☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Copy from service label)

2155 050 286

PS Form 3811, July 1999

Domestic Return Receipt

102595-99 M-1789